



Fraser Timber Supply Area, Summary of Public Input

Fraser Timber Supply Area

Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
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This is a summary of the public input that has been received on the Timber Supply Review in the Fraser Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.





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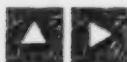
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| Timber Supply Analyses | Socio-economic Analyses | Summaries of Public Input | Rationale Statements ||

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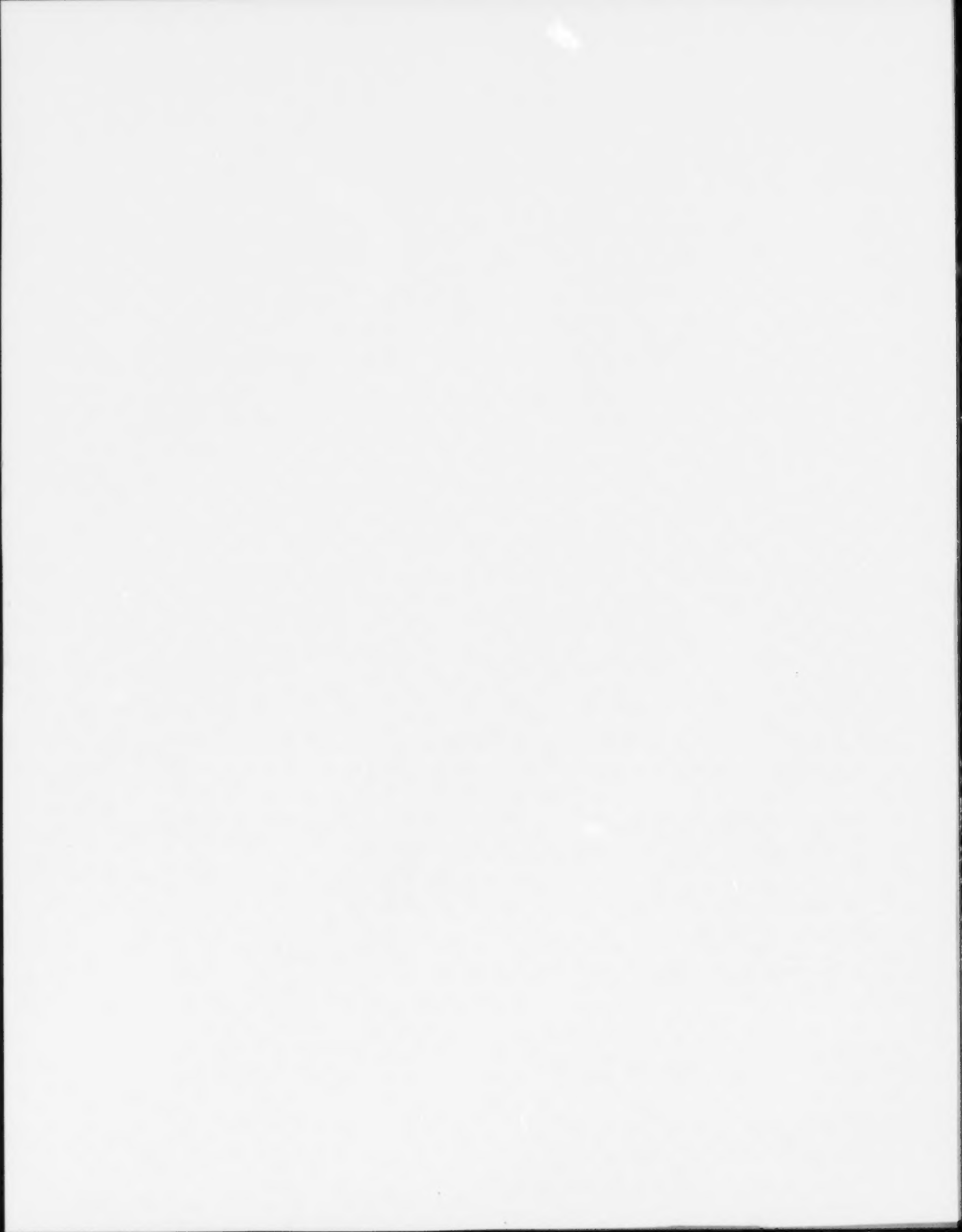


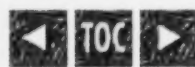
Background

As part of the review of timber supply in the Fraser Timber Supply Area, the British Columbia Forest Service distributed a *Public Discussion Paper* and two technical reports; the *Timber Supply Analysis Report* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information where appropriate. This report summarizes the input received during the 90-day review period which ended September 30, 1994. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Fraser Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Privacy Act*) can be reviewed at the Chilliwack Forest District office.







Public Review Process and Response

Chilliwack District Staff actively solicited public input on the Timber Supply Review in the Fraser Timber Supply Area through the following actions:

- direct mail-out of the three documents to over 200 organizations and businesses active within the Fraser Timber Supply Area or adjacent timber supply areas. The *Public Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager
- seven information sessions were held with representatives from the timber industry, labour, local governments and other interest groups (see Table 1)
- four open houses were advertised extensively through a direct mail-out
- radio interviews were provided
- newspaper articles were encouraged

As Table 1 shows, over 100 individuals attended the information sessions and the open houses. The Chilliwack Forest District also received four completed response forms and 15 written submissions (see Appendix 1). The Fraser Technical Working Group, which includes the major timber companies operating in the Fraser Timber Supply Area, also commissioned a consultant to technically critique the *Fraser Timber Supply Analysis Report* (referred to as the 'technical critique' in this report).

Organizations (No. of participants)

Meetings with interest groups

Fraser TSA Steering Committee (21)

July 5, 1994

IWA/Fraser Coalition (8)

July 6, 1994

Local government and regional districts

Maple Ridge (8)

July 14, 1994

Chilliwack (10)

July 13, 1994

First Nations (12)

Chilliwack

July 19, 1994

Spuzzum

July 22, 1994

Pitt Meadows

August 16, 1994

Open Houses

Chilliwack (22)

September 13, 1994

Maple Ridge (17)

September 14, 1994

Boston Bar (10)

September 15, 1994

Hope (1)

September 16, 1994

Table 1: Participation in public information sessions

Overall, those who attended these sessions indicated they were informative and useful, but the participants were surprised and disappointed by the apparent lack of public interest in this Timber Supply Review.





Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Fraser Timber Supply Area is summarized under the following headings:

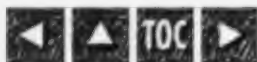
- timber supply analysis report
- socio-economic analysis
- public discussion paper

Public input on other ongoing government processes that may influence the timber supply in the Fraser Timber Supply Area in the future is summarized at the end of this section.





Timber Supply Analysis Report





Technical critique

The technical critique states "the timber supply analysis of the Fraser TSA [Timber Supply Area] published in the Timber Supply Review has been confirmed."

However, the critique contends that the growth-and-yield projections used in the Forest Service analysis for regenerated forests are conservative because:

- the timber productivity estimates (site indices) are based on existing over-mature forests and are lower than would be expected for regenerated forests on the same sites
- the effects of density and competition control treatments are not considered
- the effects of regenerating more productive species through planting in areas previously occupied by less productive species are not incorporated.

Using different projected timber yields for regenerated forests results in a timber supply forecast that "is the same as the baseline scenario (in the Forest Service analysis) up to year 30." After this point, timber supply levels are predicted to be above the base line forecast. This issue is also raised in several of the timber industry submissions.

According to the critique, neither of the main factors which limit the short-term timber supply are related to current management practices or how they were modelled in the Timber Supply Review. These factors are:

- the forest cover requirements, which are based on the practices which limit the amount of a given area that can be harvested at any time to meet integrated resource management objectives, and,
- a shortage of mature timber in 105 to 115 years due to the pattern of past harvesting.

These factors make it impossible to increase short-term supply through increased timber yields from regenerated forests.

Forest cover requirements are a major factor in the timber supply forecasts for the Fraser Timber Supply Area. In the short-term, reduced requirements in the integrated management zone did not increase the projected short-term timber supply. However, increased requirements caused a 65,000 cubic metre per year reduction in supply below the base case forecast during the first decade.

The critique makes the following recommendations about the actual current practices:

- the use of forest cover requirements to model the operational rate of harvesting "should be re-examined"
- candidate forests for commercial thinning should be identified, and
- "assignment of visually sensitive zones in the land base must be validated and agreed upon...(and) the forest cover requirements assigned to these areas must be assessed to ensure they are reasonable in light of the impact they place on timber supply"

With the exception of suggested changes in the timber productivity estimates for regenerated forests, recommendations were not provided to improve the data, assumptions or computer model used in the Forest Service analysis.





Other Public Input

• Size of the timber harvesting land base

Submissions from the timber industry suggest the economic situation has changed since the early 1990s when the economical timber within the timber supply area was mapped based on the harvesting methods that were in use at the time. Although documentation is not provided, the timber industry contends that a portion of the 67,000 hectares excluded from the timber harvesting land base is now economically viable, leading to a five to 10 per cent increase in the size of the timber harvesting land base. They believe the analysis should take this dynamic situation into consideration.

Limited opportunities for alternative harvesting methods such as skylines and helicopters are included within the timber harvesting land base based on the current use of these methods. Submissions from the timber industry state there are additional areas where these methods could be used and, as this could increase the timber harvesting land base by as much as five per cent, it should be factored into the allowable annual cut determination, possibly as a partitioned cut. The areas where alternative methods could be used are not identified in the submissions.

Several timber industry submissions suggest establishing a partitioned cut to provide opportunities for harvesting in areas outside the identified timber harvesting land base.

Other submissions state that harvesting should not be permitted in sensitive, uneconomic or marginally economic areas for ecological reasons.

• Forest management practices in visually sensitive areas

A major concern raised by the timber industry and the Fraser Coalition is the acceptable management practices defined for visually sensitive areas in the Fraser Timber Supply Area.

One submission from a timber company suggests the practices are too restrictive and a cost-benefit analysis should be done to justify the requirements. Other submissions suggest the requirements can be relaxed as the following practices are implemented:

- use of terrain modeling technology to lay out cutblocks that meet landscape level requirements
- special roadbuilding techniques and cutblock layout to increase access into these areas, and
- smaller cutblocks and better practices which will be required under the Forest Practices Code.

The requirement that regenerated forests be at least five metres tall before adjacent areas are harvested is questioned. One submission suggests the use of larger seedlings and increased stand tending could reduce the length of time used in the Forest Service analysis for regenerated forests to reach the five metre requirement.

Another suggestion is to relax the requirements in the visually sensitive areas by five per cent which is perceived to maintain the viewsapes while providing a solution to the short-term timber supply deficit. The timber supply analysis critique tested the impacts of reducing the forest cover requirements in the visually sensitive and recreation zones to

the same level as in the integrated resource management zone. This test indicates a 15,000 cubic metre per year increase in projected timber supply over the base case forecast in the first decade.

The submission from the Regional District of Fraser-Cheam questions the validity of the visual quality requirements if they will lead to reduced employment: "We are not convinced that it is desirable to apply one standard of logging to areas that can be seen and another standard to less accessible areas. A good forest practices code should be adequate for both of them." The Regional District also points to the British Columbia Forest Service's own analysis which indicates a five per cent reduction in visual quality requirements would remove the immediate need to reduce the allowable annual cut.

Other submissions indicate tourism is very important to the Fraser Timber Supply Area and some argue that clearcuts are simply not acceptable within viewscapes. On the other hand, comments from local government and some individuals suggest increased effort is required to help the public understand and accept that timber harvesting is an integral part of British Columbia's economy and it should not be hidden from public view.

- **Deer winter range**

The timber industry questions the requirements for deer winter range used in the timber supply analysis. The industry perceives that the inventory of deer winter range is inaccurate. They also question the application of winter range requirements throughout most of the timber supply area when winter range areas usually develop only in Douglas-fir forests. Industry also suggested that timber production should take priority over wildlife habitat requirements, or a more balanced approach is appropriate.

- **Analysis of management options**

Some input was received which suggests the Timber Supply Review should explore management options as opposed to only analyzing current management practices.





Socio-Economic Analysis

• Employment and community impacts

Some submissions question the estimate in the *Socio-Economic Analysis* that 2.2 person-years of indirect employment is generated in the province by each direct person-year of forestry employment in the Fraser Timber Supply Area. No documentation to support these perceptions or alternative estimates are provided. These submissions emphasize that reductions in the allowable annual cut would result in layoffs for companies which service the forest industry. Some submissions suggest the *Socio-Economic Analysis* does not adequately acknowledge that urban areas will be affected by the lost revenues that will result from a reduction in the allowable annual cut.

Some individuals and local government point out that timber harvesting and silvicultural activity in the timber supply area should benefit local communities. There are concerns that local mills sometimes have a difficult time finding wood supply, indicating the need for strategies to support local manufacturing. Concern is expressed in the timber industry submissions about the ability of communities which are heavily dependent on harvesting jobs, including Hope and Chilliwack, to adjust to reductions in the allowable annual cut.

The timber industry is also concerned about the cumulative effects of allowable annual cut reductions throughout the province on Fraser Valley mills which depend on timber supply from a number of sources. One timber company recommends that a regional approach be used to address this issue, but this approach is not expanded upon. In contrast, one individual indicates employment is not as important an issue in the Fraser Timber Supply Area as in other parts of the province.

While local governments recognize that short-term job losses may be offset with

increased value-added manufacturing, commercial thinning and intensive silviculture which would also benefit the long-term timber supply, they contend that the burden of developing strategies to address job losses should not be placed solely on local governments; the provincial government should also provide resources to deal with expected unemployment. Many submissions acknowledge the potential of the Forest Renewal Plan to offset projected job losses.

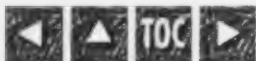
• Non-timber values

Some submissions suggest that benefits from non-timber values such as mushrooms, botanical forest products (greens, boughs, etc.), forest recreation and tourism have not been adequately accounted for in the *Socio-Economic Analysis*. The Outdoor Recreation Council contends the analysis fails to address the impacts of current management practices and future options on non-timber resource values such as recreation and fish and wildlife.

• First Nations

One First Nation feels the *Socio-Economic Analysis* does not address their concerns about sustainability within their traditional territory. This First Nation believes the allowable annual cut should not be set until the issues of economic benefits and sustainability within their traditional territory are addressed.

The Nlaka'pamux Nation Tribal Council expressed concern that the Forest Service is "planning a big increase in the rate of harvesting on our lands to compensate for the large areas in the Fraser Valley being removed from the working forest." This is in reference to the 'log-around' strategy that is being implemented to defer harvesting in areas that are currently under review for protected status under the Protected Areas Strategy or the Spotted Owl Interim Conservation Strategy.





Public Discussion Paper

Several issues raised in the *Public Discussion Paper* prompted public input.

- **Intensive silviculture and species conversion**

Submissions from the timber industry indicate intensive silviculture should offset the projected long-term timber supply reductions. Comments were also made on the need to explore the option of converting productive forest land from deciduous species to conifers to increase the long-term timber supply.

- **Commercial thinning**

Submissions from the timber industry indicate that, in some areas of the Fraser Timber Supply Area, 60-year-old second-growth forests with very high growth rates are ideal candidates for commercial thinning. These submissions also suggest the impacts of commercial thinning on timber yield projections should be researched as an option to maintain short-term harvest. Some suggest increased yields through commercial thinning should influence both the short- and long-term timber supply.

The critique of the timber supply analysis completed for the Fraser Timber Supply Area Working Group indicates the timber supply could be increased by 8,000 cubic metres per year above the base case forecast over the first 10 years by implementing a commercial thinning program on all good and some medium growing sites in the timber supply area.

- **Allowable annual cut adjustment**

Many suggestions were provided on whether and how the allowable annual cut should be adjusted. This input varies from a suggestion that a reduction is not needed, to support for immediate reductions, either to the long-term sustainable level or by as much as 30 per cent

to protect tourism, fish and wildlife values, and aboriginal land interests. Generally most of the input agrees that a reduction to the allowable annual cut is inevitable. Several alternative ways to implement a reduction were provided:

- one timber industry submission suggests that a reduction to 1.55 million cubic metres per year as indicated by the base case forecast is needed. A review of factors such as the size of the timber harvesting land base and practices in visually sensitive areas should follow, which is expected to indicate this to be the long-term sustainable level.
- another industry submission recommends a reduction to 1.55 million cubic metres per year by excluding the existing deciduous licence (65,000 cubic metres per year) from the allowable annual cut, followed by a four per cent reduction on January 1, 1995, and a five per cent reduction on January 1, 1997
- others recommend the allowable annual cut be reduced by three per cent per year for 10-12 years because this would be easier for the timber industry to manage

- some industry submissions suggest the reduction should be constant over the short-term at two per cent per year to match the rate of attrition from the workforce
- another alternative is an annual adjustment of two per cent per year for the first five years followed by a steady reduction over the next 14 years to allow the phase-in of the Forest Renewal Plan

The Regional District of Fraser-Cheam is "not convinced that the evidence is there" in the timber supply analysis to justify a major reduction in the allowable annual cut. They are concerned that the range of the variables and the resulting timber supply projections do not provide enough information for this decision.





Related processes

Comments on other ongoing government processes in the Fraser Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Protected Areas Strategy and Spotted Owl Interim Conservation Strategy**

These processes are of significant concern to the timber industry. Decisions to protect spotted owl habitat and significant ecological areas through the Protected Areas Strategy may result in a reduced timber harvesting land base. It is perceived that this will have significant impacts on the short- and long-term timber supply. As a result, some submissions suggest that a working forest land base should be identified and protected through legislation.

- **Treaty negotiations**

Local First Nations indicate that once treaty negotiations are completed, further analysis will be required to adjust harvest levels.

- **Watershed management requirements**

New requirements for watershed assessments in the Forest Practices Code and the new Community Watershed Guidelines will change practices within community watersheds throughout British Columbia. BC Environment staff believe these practices will impact the timber supply in the Fraser Timber Supply Area in the future.





Appendix 1





Submissions received by the Chilliwack Forest District

Local government

Nlaka'pamux Nation Tribal Council, Lytton Regional District of Fraser-Cheam, Chilliwack

Government agencies

Ministry of Environment, Lands and Parks, Water Management Branch, Lower Mainland Region

Industry

Canadian Forest Products Limited, Vancouver

Cattermole Timber, Sardis

G & F Logging, Sardis

International Forest Products Limited, Vancouver

Sardis Explosives Limited, Sardis

Interest groups

Fraser Coalition for Sustainable Forests, Chilliwack (four submissions)

Outdoor Recreation Council of British Columbia, Vancouver

(two unidentified submissions were also received)



